

Modern Slavery & Human Trafficking Statement

This statement sets out the Scolmore Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

Scolmore is a group of Companies consisting of Scolmore International, Sangamo Ltd, ESP Ltd and Unicrimp Ltd. As part of wholesale electrical and manufacturing industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

The Group is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking in line with the requirements of the Modern Slavery Act 2015, Employment Law and the Human Rights Act.

Our policy is Zero tolerance and we expect all in our supply chain to comply with our values. If a supplier is found to be operating with unacceptable practices, they will be investigated and provided with guidance to remedy the situation. If no improvement is implemented or they indicate an unwillingness to cease the unacceptable practices, then our trading relationship will cease with immediate effect and we will report them to the appropriate authorities.

This statement covers the activities of every Company within the Scolmore Group.

Organisational Structure and Supply Chains

Based in the Midlands we are well located to design, develop, manufacture and distribute our product range throughout the UK. Through our own brand of CLICK electrical and lighting products, we are committed to providing a comprehensive range of reliable, high quality and competitively priced products to our customers, whilst also offering a bespoke design and manufacture service to ensure we provide exactly the right solution and product for any installation or project.

Our New Product Development Team are constantly tracking market trends, building regulations and approval standards so that we continue to increase our product range to meet the ever-changing needs of our customers.

As a Group, we constantly review our policies and procedures to ensure continual compliance and that our risk management remains up to date, which helps us to ensure our associated risks, detection and prevention of modern-day slavery and human trafficking within our supply chain for products and services provided to our Group of Companies.

Countries of Operation and Supply

The Company currently operates in the following countries:

- United Kingdom
- Ireland
- Dubai
- India
- China
- Australia

Responsibility

Responsibility for the Group Companies anti-slavery initiatives and this policy statement is owned, implemented and monitored by the Group HR Director.

Relevant Policies

The Group Companies operate the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy**

The Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Group's whistleblowing procedures are designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.

- **Employee Code of Conduct**

The code makes clear to employees the actions and behaviour expected of them when representing the Scolmore Group of Companies. The Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier Code of Conduct**

The Scolmore Group of Companies is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations

of the Groups supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment/Agency workers**

The Scolmore Group of Companies use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

The Scolmore Group of Companies undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Group's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments annually which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance Indicators

The Scolmore Group of Companies have reviewed its key performance indicators (KPIs). As a result, the Group:

- requires relevant staff to have completed training on modern slavery annually (where applicable);
- conducts a review of potential suppliers before they enter the supply chain; and
- conducts annual audit review of all our suppliers and their processes.

Training

The Scolmore Group of Companies require staff working in Purchasing, HR, QHSE and Sales to complete training on modern slavery as a module within the Groups wider human resource training programme.

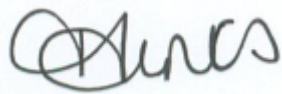
The Group's modern slavery training covers:

- our business' purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company/Group; and
- what steps the Company/Group should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Board Approval

This statement was approved on 29th March 2019 by the Group HR Director, on behalf of the Group Board, who review and update it annually.

Group HR Director signature:



Jo Jinks MCIPD
Group HR Director
29th March 2019